

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

**AMERICAN POSTAL WORKERS UNION, AFL-CIO,
RESPONSE IN SUPPORT OF PUBLIC REPRESENTATIVE'S
MOTION TO EXTEND DEADLINE FOR FILING REBUTTAL TESTIMONY**
(September 12, 2011)

On September 9, 2011, the Public Representative filed a Motion to Extend Deadline for Filing Rebuttal Testimony. The American Postal Workers Union, AFL-CIO, file this response in support of the Public Representative's Motion.

In her Motion, the Public Representative states "that a portion of the Postal Service's direct case is still forthcoming." In addition, on September 7, 2011, one day before the hearing on the record, the Postal Service filed seven (7) Library References, with several of them filed under seal. As indicated previously in this docket, APWU intends to submit rebuttal testimony. Time is needed to review these Library References and other material still forthcoming in order to present rebuttal that will aid the Commission in providing a comprehensive advisory opinion. As stated by the Public Representative, an extension will afford all parties "a robust and accurate record before being required to file testimony."

For these reasons, and the reasons expressed by the Public Representative, the APWU respectfully requests that the Public Representative's Motion be granted.

Respectfully submitted,

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